

Torres, Francine

From: bbensing@snakking.com%inter2 [bbensing@snakking.com] on behalf of bbensing@snakking.com
Sent: Tuesday, August 16, 2005 4:38 PM
To: National List
Subject: NOP TM-04-07
Attachments: ATTACHMENT.TXT; header.htm; image001.gif

To: Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP

Re: Docket Number TM-04-07

August 16, 2005

Dear Mr. Neal,

We have been manufacturing grain-based “organic” and “made with organic” processed foods for five years and are of the opinion that the original selection of compounds placed on the National List of Allowed and Prohibited Substances, § 205.605, was made using sound scientific and economic judgment that maintains the integrity and intent of the organic program in providing healthy alternatives to the consumer. The compounds identified on the National List of Allowed Substances are necessary ingredients either for our products or to manufacture many of the organic raw ingredients that we purchase to use in our products. These compounds are not currently available in a “certified organic” form and to disallow them from use in “organic” or “made with organic” food products would virtually eliminate all certified organic processed foods from the market place.

We specifically support the continued allowance of the following compounds:

From 205.605 (a) nonsynthetics allowed

Acids – citric and lactic
Animal Enzymes – Rennet, Animal Lipase
Calcium Carbonate
Calcium Chloride
Carageenan
Colors, no synthetic sources
Dairy Cultures
Enzymes – derived from edible nontoxic plants, non pathogenic fungi or bacteria
Flavors – non-synthetic sources without synthetic solvents, carriers or preservatives
Nitrogen, oil free
Potassium chloride
Sodium bicarbonate
Yeast – non-synthetic

From 205.605 (b) synthetics allowed

Ascorbic Acid
Calcium hydroxide

8/18/2005

Calcium phosphate
Chlorine Materials (as specified for sanitizing)

Glycerides
Glycerin
Lecithin
Magnesium carbonate
Phosphoric acid
Potassium carbonate
Sodium phosphate
Tocopherols
Xanthan gum

From 205.606

- (a) Cornstarch (native)
- (b) Gums (water extracted)
- (c) Lecithin- unbleached

These items are intrinsic ingredients or aids to the formulation of food products to produce required characteristics in flavor, texture, shelf life, food safety and other desired qualities. These materials are not available in organic form and their use in “organic” and “made with organic” food products has, thus far, produced no deleterious effects on the foods or the consumers who have eaten them. To disqualify them from use in conjunction with organic products would cause the removal of a major number of the organic packaged products consumers now enjoy and it would also seriously reduce the demand for organically grown agricultural products, which will have a negative economic impact on the organic farmers and the organic industry as a whole. Please insure the continued growth of the packaged and processed organic food industry by supporting the continued allowance of the items on the National List.

Sincerely,

Beverly Bensing
Director Research & Development
Snak King